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18 PEPPER LANE-COSMO, LLC and
19 CLASSIC BURGERS, INC., d/b/a CLASSIC
BURGERS

20 **UNITED STATES DISTRICT COURT**

21 **NORTHERN DISTRICT OF CALIFORNIA**

22 _____ Case No. CV13-0444
23 RICHARD JOHNSON,)
Plaintiff,)
vs.)
PEPPER LANE-COSMO, LLC; CLASSIC) **STIPULATION AND PROPOSED**
24 CLASSIC BURGERS, INC., d/b/a CLASSIC) **ORDER FOR DISMISSAL OF**
25 BURGERS, and DOES 1-20,) **CLAIMS WITH PREJUDICE**
Defendants.) **[F.R.C.P. §§ 41(a)(1)(ii) and (2)]**
26)
27)
28)

STIPULATION

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff RICHARD JOHNSON (“Plaintiff”) and Defendants PEPPER LANE-COSMO, LLC and CLASSIC BURGERS, INC., d/b/a CLASSIC BURGERS (“Defendants”), by and through their respective attorneys of record, stipulate that:

1. Plaintiff's Complaint in the above-entitled action shall be dismissed with prejudice against Defendants;
 2. The Court will retain jurisdiction to enforce the terms of the parties' SETTLEMENT AGREEMENT AND RELEASE signed by all parties and approved by their respective attorneys;
 3. All parties shall bear their own costs and fees in the action.

IT IS SO STIPULATED

Dated: 11/20/2013

/s/Irene Karbelashvili
By: Irene Karbelashvili, Esq.
Attorney for Plaintiff
RICHARD JOHNSON

Dated: 11/25/2013

/s/Rachel Valadez
By: Rachel Valadez, Esq.
Attorney for Defendants
PEPPER LANE-COSMO, LLC
and CLASSIC BURGERS, INC.,
d/b/a CLASSIC BURGERS

Pursuant to Local Rule 5-1, I attest under penalty of perjury that concurrence of the filing of this document has been obtained from its signatory.

Dated: 11/20/2013

/s/ Irene Karbelashvili
Irene Karbelashvili, Esq.

ORDER

Having reviewed the above Stipulation for Dismissal with Prejudice by Plaintiff RICHARD JOHNSON on the one hand ("Plaintiff") and Defendant RICHARD C. CONGER, TRUSTEE OF CONGER FAMILY 2002 TRUST ("Defendant") on the other hand,

IT IS HEREBY ORDERED that:

1. Plaintiff's Complaint in the above-entitled action shall be dismissed with prejudice as against Defendant;
 2. The Court will retain jurisdiction to enforce the terms of the parties' SETTLEMENT AGREEMENT AND RELEASE IN FULL signed by both parties and approved by their respective attorneys;
 3. Each Party shall bear his own costs and fees in this action.

Dated: , 2013

Honorable HOWARD R. LLOYD
United States District Judge